

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re: STUDENT FINANCE CORPORATION, Debtor.	Chapter 7 Case No. 02-11620 (KJC)
CHARLES A. STANZIALE, JR., CHAPTER 7 TRUSTEE OF STUDENT FINANCE CORPORATION, Plaintiff, v. PEPPER HAMILTON LLP, <u>ET AL.</u> , Defendants.	Civil No. 04-1551 (JJF)
ROYAL INDEMNITY COMPANY, Plaintiff, v. PEPPER HAMILTON LLP, <u>ET AL.</u> , Defendants.	Civil No. 05-165 (JJF)

**MOTION OF DEFENDANTS PEPPER HAMILTON LLP AND
W. RODERICK GAGNÉ, IN HIS CAPACITY AS AN ATTORNEY
PRACTICING AT PEPPER HAMILTON LLP, TO STRIKE EXPERT
REPORTS AND PRECLUDE TESTIMONY OF DOUGLAS M. BRANSON,
NANCY J. MOORE AND STEVEN L. SCHWARCZ**

For the reasons set forth in the accompanying Brief, defendants Pepper Hamilton LLP and W. Roderick Gagné, in his capacity as an attorney practicing at Pepper Hamilton LLP, respectfully move this Court to enter an Order in the form attached hereto (a) striking the expert reports of Douglas M. Branson, Nancy J. Moore and Steven L. Schwarcz, (b) precluding all three witnesses from testifying at the trial of this action, and (c) granting such further and other relief as is just and proper.

Dated: May 11, 2007
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ William H. Sudell

William H. Sudell, Jr. (No. 0463)
Donna L. Culver (No. 2983)
Daniel B. Butz (No. 4227)
1201 North Market Street
P.O. Box 1347
Wilmington, Delaware 19899-1347
(302) 658-9200
(302) 658-3989 (facsimile)

- and -

Elizabeth K. Ainslie
Nicholas J. LePore, III
Bruce P. Merenstein
Stephen J. Shapiro
SCHNADER HARRISON SEGAL & LEWIS LLP
1600 Market Street, Suite 3600
Philadelphia, Pennsylvania 19103
(215) 751-2000
(215) 751-2205 (facsimile)

*Attorneys for defendants Pepper Hamilton LLP
and W. Roderick Gagné, in his capacity as an
attorney practicing at Pepper Hamilton LLP*

- and -

Charles A. Gilman
David G. Januszewski
Cahill Gordon & Reindel LLP
Eighty Pine Street
New York, New York 10005
(212) 701-3000
(212) 269-5420 (facsimile)

Attorneys for defendant Pepper Hamilton LLP

825303.2